| UNITED STATES DISTRICT COURT |
|-------------------------------|
| SOUTHERN DISTRICT OF NEW YORK |

KLEIMAR, N.V.,

Plaintiff.

ECF CASE

against

16 CV 9486 (AJN) (DCF)

DALIAN DONGZHAN GROUP CO., LTD.
BENXI BEIYING IRON AND STEEL GROUP
IMPORT AND EXPORT CORP. LTD.,
BEIGANG HONG KONG LIMITED, and
BEITAI IRON & STEEL GROUP CO., LTD.,

ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL

USA CORP.

Defendants.

.

TO THE MARSHALL OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK:

Pursuant to Rule B(3)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure and in response to a certain Process of Maritime Attachment and Garnishment in the above-captioned matter dated January 9, 2017, and served upon Garnishee MACSTEEL INTERNATIONAL USA CORP. ("MACSTEEL") on or about January 12, 2017, Garnishee MACSTEEL hereby states that on such date of service, it was not indebted to the Defendants DALIAN DONGZHAN GROUP CO., LTD., BENXI BEIYING IRON AND STEEL GROUP, IMPORT AND EXPORT CORP. LTD., BEIGANG HONG KONG LIMITED, or BEITAI IRON & STEEL GROUP CO., LTD (collectively, "Defendants"), and did not otherwise have in its possession any property, tangible or intangible, including funds, assets, cash, good, chattels, credits, effects, debts, owed by or owed to the Defendant(s) or monies to be paid to discharge a debt owed to the Defendant(s), including monies being transferred by, to or for the benefit of the Defendant(s).

Dated: New York, New York January 30, 2017

DLA PIPER LLP (US)

By:

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Attorneys for Garnishee Macsteel International USA Corp.

VERIFICATION

| STATE OF NEW YORK |) | |
|--------------------|---|----|
| |) | SS |
| COUNTY OF NEW YORK |) | |

Margo Rosner Marks, being duly sworn, deposes and says as follows:

I am the Managing Director for Macsteel International USA Corp. ("Macsteel"). I have reviewed the contents of the foregoing Answer of Garnishee Macsteel in response to Plaintiffs' Maritime Attachment and Garnishment in Docket No. 16 Civ. 09486(AJN) and know the contents thereof and that the same are true to Macsteel's files, and communications with relevant employees of the company.

Margo Rosner Marks

Sworn to before me on January <u>22</u>, 2017

Notary Public

DINETAH FAITH SIMS
Notary Public, State of New York
No. 02SI6346238
Qualified in Westchester County
Commission Expires August 8, 20 20

CERTIFICATE OF SERVICE

I, Neal Kronley, hereby certify that on the 30th day of January, 2017, I caused the foregoing Answer of Garnishee Macsteel International USA Corp. in Response to Maritime Attachment and Garnishment to be served by ECF and email upon:

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Counsel for Plaintiff

Neal F. Kronley